

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Skky, Inc.,

Case No.: 13-2086 (PJS/HB)

Plaintiff,

v.

Manwin USA, Inc., and Manwin Holding,  
s.ar.l,

Defendants.

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**DECLARATION OF RYAN M. SCHULTZ IN SUPPORT OF SKKY'S  
MOTION TO ENFORCE THIS COURT'S OCTOBER 29TH, 2014 ORDER,  
REQUIRE PRODUCTION OF OVERALL WEBSITE REVENUE FOR ALL  
ACCUSED WEBSITES, AND AWARD SKKY COSTS AND FEES**

Pursuant to 28 U.S.C. § 1746, I, RYAN M. SCHULTZ, declare:

I am an attorney in the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., and I am one of the attorneys representing the Plaintiff Skky, Inc., ("Skky"), in the above-captioned matter. I am admitted to practice in the District of Minnesota.

1. I make these statements in support of Skky's Motion to Enforce This Court's October 29th, 2014 Order, Require Production of Overall Website Revenue For all Accused Websites, and Award Skky Costs and Fees.
2. On November 21, 2014, my colleagues and I met and conferred with counsel for Manwin regarding deficiencies in their November 19, 2014 production of financial documents ordered by this Court on July 9, 2014 and October 29, 2014.

3. During the November 21, 2014 meet and confer, counsel for Skky asked counsel for Manwin to explain its non-compliance with the Court's October 29 Order to produce overall website revenue for all websites identified in Plaintiff's amended infringement contentions.
4. Counsel for Manwin responded that it did not think it needed to produce overall website revenue because Skky would be able to calculate overall website revenue from the audited financial statements already produced in combination with yet-to-be-produced website analytics.
5. Counsel for Skky asked counsel for Manwin to contact counsel for Skky no later than the following Monday, November 24, with its decision on whether it intended to comply with the Court's October 29th Order.
6. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by Manwin, Bates numbered MAN00014555-57 [**Filed Under Seal**].
7. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of Gillian Wright.
8. Attached hereto as **Exhibit 3** is a true and correct copy of correspondence from Tamany Bentz to Ryan Schultz dated November 24, 2014.
9. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the September 25, 2014 motions hearing.

I declare, under penalty of perjury, that the foregoing is true and correct.  
Executed this 26th day of November, 2014.

By: s/ Ryan M. Schultz  
Ryan M. Schultz